

Hanoch Sheps
hanoch@mazzolalindstrom.com

D: 646.216.8126
M: 201.696.6881

June 28, 2018

LETTER REQUEST ON CONSENT

Hon. Michael J. Roemer
United States Magistrate Judge
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, New York 14202

Re: Douglas J. Horn and Cindy Harp-Horn v. Medical Marijuana, Inc., Dixie Elixirs and Edibles, Red Dice Holdings, LLC and Dixie Botanicals Civil Action No. 1:15-cv-00701 FPG/MJR

Dear Magistrate Judge Roemer:

As you may recall, we represent the party sued incorrectly herein as Defendant Dixie Elixirs and Edibles in the above-referenced matter. We write to respectfully request a 30-day extension of the current July 30, 2018 deadline for dispositive motions. We have consulted and obtained consent from all counsel for this request, all of whom are copied on this letter request. This is the first request made by Dixie for an extension of this deadline.

The reason for the extension request is that I recently left Messner Reeves LLP together with Jean-Claude Mazzola and Wendy Lindstrom, the lead partners on this matter, and we are now with Mazzola Lindstrom LLP. Dixie has already executed a File Transfer Request letter which we sent to Messner Reeves LLP on or about June 18, 2018; we have not yet received the file. Dixie will be significantly prejudiced in preparation of a dispositive motion if counsel is without access to the client's extensive files and those produced by all counsel thus far. Due to the voluminous record we expect it will take some time to complete the file transfer.

We appreciate the Court's courtesy and consideration in this matter. Please contact me with any question the Court may have.

Respectfully submitted,

Hanoch Sheps

CC: All parties via ECF